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Attorneys for Defendant Apple Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

Master Docket No. 11-CV-2509 LHK

**OMNIBUS DECLARATION OF  
CHRISTINA J. BROWN IN SUPPORT  
OF DEFENDANTS' REPLIES IN  
SUPPORT OF JOINT MOTION TO  
EXCLUDE TESTIMONY OF EDWARD  
E. LEAMER, PH.D. AND JOINT  
MOTION TO STRIKE IMPROPER  
REBUTTAL TESTIMONY IN DR.  
LEAMER'S REPLY EXPERT REPORT**

Date: March 20, 2014 and  
March 27, 2014  
Time: 1:30 p.m.  
Courtroom: 8, 4th Floor  
Judge: The Honorable Lucy H. Koh

1 I, Christina J. Brown, declare as follows:

2 1. I am a member of the Bar of the State of California and a counsel at O'Melveny &  
3 Myers LLP, attorneys for Defendant Apple Inc. I submit this declaration in support of  
4 Defendants' Replies in Support of Joint Motion to Exclude the Expert Testimony of Edward E.  
5 Leamer, Ph.D. and Joint Motion to Strike the Improper Rebuttal Testimony in Dr. Leamer's  
6 Reply Expert Report or, in the Alternative, for Leave to Submit a Reply Report of Dr. Stiroh.  
7 I make this declaration based on my own personal knowledge. If called to testify as a witness,  
8 I could and would do so competently.

9 2. Attached hereto as Exhibit A is a true and correct copy of the November 12, 2012  
10 Expert Report of Professor Kevin M. Murphy.

11 3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the  
12 October 26, 2012, November 18, 2013, and December 19, 2013 deposition testimony of Dr.  
13 Edward Leamer.

14 4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the  
15 December 3, 2012 deposition testimony of Dr. Kevin Murphy.

16 5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the  
17 December 9, 2013 deposition testimony of Dr. Lauren Stiroh.

18 6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the  
19 January 29, 2013 deposition testimony of Paul Otellini.

20 7. Attached hereto as Exhibit F is a true and correct copy of a document produced by  
21 Google bearing Bates number GOOG-HIGH-TECH-00058864.

22 8. Attached hereto as Exhibit G is a true and correct copy of excerpts from the  
23 Federal Judicial Center, *Reference Manual on Scientific Evidence* (3d ed. 2011).

24 9. Attached hereto as Exhibit H is a true and correct copy of excerpts from  
25 *Understanding and Using Advanced Statistics* (2006).

26 10. Attached hereto as Exhibit I is a true and correct copy from the *STATA Manual -*  
27 *Stata 13 help for regress*. The document was printed from <http://www.stata.com/help.cgi?regress>,  
28 which was last visited on February 27, 2014.

11. Attached hereto as Exhibit J is a true and correct copy of excerpts from *Statistics in a Nutshell* (1st ed. 2008).

12. Attached hereto as Exhibit K is a true and correct copy of excerpts from *A Guide to Modern Econometrics* (2d ed. 2004).

13. Attached hereto as Exhibit L is a true and correct copy of excerpts from *A Course in Econometrics* (1991).

14. Attached hereto as Exhibit M is a true and correct copy of excerpts from *Proving Antitrust Damages, Legal and Economic Issues* (2d ed. 2010).

15. Attached hereto as Exhibit N is a true and correct copy of excerpts from *Principles of Econometrics* (4th ed. 2011).

16. Attached hereto as Exhibit O is a true and correct copy of excerpts from *Microeconometrics, Methods and Applications* (2005).

17. Attached hereto as Exhibit P is a true and correct copy of Multicountry, Multifactor Tests of the Factor Abundance Theory, *The American Economic Review* (Dec. 1987).

18. Attached hereto as Exhibit Q is a true and correct copy of Sets of Posterior Means with Bounded Variance Priors, *Econometrica* (May 1982).

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on February 27, 2014, in San Francisco, California.

/s/ Christina J. Brown  
Christina J. Brown